

Exhibit J

DECLARATION OF TRAVIS DAY

I, Travis Day, pursuant to 28 U.S.C. § 1746, do hereby swear and affirm under penalty of perjury as follows:

1. The facts stated in this Declaration are true and correct and are based on my personal knowledge. I am over eighteen years of age and under no legal disability. I am providing this statement voluntarily without any threat or promise of reward having been made to me.

2. My name is Travis Day.

3. Previously, I was employed by MHM Health Professionals, LLC (“MHMHP”).

4. MHMHP employs health care professionals who work at Marshall County Correctional Facility (“MCCF”).

5. I worked as the Health Services Administrator at MCCF.

6. During my employment, I reported to April Meggs, the Vice President of Operations for MHM Health Professionals, LLC.

7. Prisoners convicted of murder, rape, and other heinous crimes are incarcerated at MCCF.

8. At any given point, approximately 1,000 prisoners are incarcerated at MCCF.

9. While I worked at MCCF, Jesse Williams served as Warden of the facility.

10. Warden Jesse Williams, who is not employed by MHMHP, controls facility access.

11. MHMHP employees must have facility access in order to enter and exit MCCF.

12. As part of my job responsibilities, I managed the administrative aspect of health services. Specifically, I planned, coordinated, directed, and supervised the clinical program that provided services to patients incarcerated at MCCF.

13. I worked at MCCF while Dr. Amy Woods also worked there. We served together for approximately 2-3 months.

14. During Dr. Woods's employment, she circumvented the normal procurement channels and distributed special products for prisoners. Namely, she distributed soap, shampoo, body wash, and toothbrushes to prisoners.

15. Once these products were admitted within the facility, they had the potential to become contraband.

16. During the week of June 9, 2019, I had a conversation with Dr. Woods. She told me that she had spoken to a state representative about information related to security at MCCF, such as its staffing levels.

17. According to Dr. Woods, the content of her statement to the state representative concerned the inner workings of the prison facility, the number of security staff present, and aspects she did not like.

18. I reported this conversation to my supervisor, April Meggs, MHMHP's Vice President of Operations, via email.

19. I also informed Warden Jesse Williams that Dr. Woods said that she made a statement to the state representative.

20. Warden Williams later told me that he was revoking Dr. Woods's security clearance necessary to enter MCCF.

21. I did not have any involvement in Warden Williams' decision to revoke Dr. Woods's security clearance.

22. I did not wish to see Dr. Woods's employment terminated.

23. At no point did I ask Dr. Woods to ignore prisoners' right to medical care.

24. I did not request that Dr. Woods refrain from sending prisoners to an outside medical facility.

25. I did not discourage Dr. Woods from sending prisoners to an outside medical facility.

26. I am not aware of any MHMHP employee demanding that Dr. Woods

refuse to give prisoners care.

27. I am not aware of any MHMHP employee encouraging Dr. Woods to refuse to provide care to prisoners.

28. I am not aware of any MHMHP employee directing, demanding, or asking Dr. Woods to ignore the prisoners' medical needs.

29. I am not aware of any MHMHP employee who implied that Dr. Woods should ignore prisoners' medical needs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29 day of August, 2020


Travis Day

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